

"Sofat, Sanjay"
<Sanjay.Sofat@Illinois.gov>

12/12/2012 09:08 AM

To Ryan Bahr

cc "Miles, Jim", "Stitely, Joe", Cheryl Burdett, James Coleman

bcc

Subject RE: IL CAFO inventory call

Thanks.

Sanjay K. Sofat
Division Manager
Division of Water Pollution Control
Bureau of Water
Illinois EPA
1021 North Grand Ave. East
Springfield, IL 62794-9276

Phone: 217-558-2012

Fax: 217-782-5549

e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [mailto:Bahr.Ryan@epamail.epa.gov]

Sent: Wednesday, December 12, 2012 9:04 AM

To: Sofat, Sanjay

Cc: Miles, Jim; Stitely, Joe; Burdett.Cheryl@epamail.epa.gov; Coleman.James@epamail.epa.gov

Subject: IL CAFO inventory call

10:00 Central

call in to: 877-226-9607

enter code: 189 635 0612

I've invited Cheryl and James, too. (Ben Atkinson is out today)

▼ "Sofat, Sanjay" ---12/12/2012 08:45:42 AM---If you have a call in number that would help. Thanks,
Sanjay K. Sofat

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>

To: Ryan Bahr/R5/USEPA/US@EPA,

Cc: "Miles, Jim" <Jim.Miles@Illinois.gov>, "Stitely, Joe" <Joe.Stitely@Illinois.gov>

Date: 12/12/2012 08:45 AM

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

If you have a call in number that would help. Thanks,

Sanjay K. Sofat
Division Manager
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Springfield, IL 62794-9276

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e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Wednesday, December 12, 2012 8:40 AM

To: Sofat, Sanjay

Cc: Miles, Jim; Stitely, Joe

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Sanjay,
can I call you or should I get a call in number?

▼ "Sofat, Sanjay" ---12/11/2012 02:03:38 PM---Ryan- I am inviting Joe and Jim to participate. Let's do at 10 am tomorrow. Thanks, Sanjay K. Sofa

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>

To: Ryan Bahr/R5/USEPA/US@EPA,

Cc: "Miles, Jim" <Jim.Miles@Illinois.gov>, "Stitely, Joe" <Joe.Stitely@Illinois.gov>

Date: 12/11/2012 02:03 PM

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Ryan- I am inviting Joe and Jim to participate. Let's do at 10 am tomorrow. Thanks,

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e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Tuesday, December 11, 2012 1:21 PM

To: Sofat, Sanjay

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Inventory discussion tomorrow morning sometime before 1:30?

or next Wednesday (19th - except 11 to 1) or Thursday (20th)?

▼ "Sofat, Sanjay" ---11/28/2012 08:39:51 AM---Thursday is a busy day for me. Just let me know when you can meeting. Thanks, Sanjay K. Sofat

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>

To: Ryan Bahr/R5/USEPA/US@EPA,

Date: 11/28/2012 08:39 AM

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Thursday is a busy day for me. Just let me know when you can meeting. Thanks,

Sanjay K. Sofat

Division Manager

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e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Wednesday, November 28, 2012 7:37 AM

To: Sofat, Sanjay

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

I have a meeting all afternoon and all day on Friday. Although, I expect that the Friday meeting will let out in the afternoon(Maybe 2:30??). Next week is just as busy so I'll try to call you whenever that meeting wraps. Alternatively, I have some pockets of time(11:00) this Thursday, but it sounds like Thurs may not work for you.

▼ "Sofat, Sanjay" ---11/27/2012 03:05:42 PM---Ryan- now that we are done with CAFO WP, I would like to talk to you about CAFO Inventory. Would yo

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>

To: Ryan Bahr/R5/USEPA/US@EPA,

Cc: Dean Maraldo/R5/USEPA/US@EPA, "Willhite, Marcia" <Marcia.Willhite@Illinois.gov>

Date: 11/27/2012 03:05 PM

Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Ryan- now that we are done with CAFO WP, I would like to talk to you about CAFO Inventory . Would you be available tomorrow afternoon or anytime on Friday ? Please let me know, Thanks,

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From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]
Sent: Tuesday, November 27, 2012 1:45 PM
To: Sofat, Sanjay
Cc: Maraldo.Dean@epamail.epa.gov; Willhite, Marcia
Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Thanks Sanjay. We'll make that change.

▼ "Sofat, Sanjay" ---11/27/2012 01:18:25 PM---Ryan- I slightly modified the language, see underlined. I did check with Token on entering unpermit

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Cc: Dean Maraldo/R5/USEPA/US@EPA, "Willhite, Marcia" <Marcia.Willhite@Illinois.gov>
Date: 11/27/2012 01:18 PM
Subject: RE: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Ryan-

I slightly modified the language, see underlined. I did check with Token on entering unpermitted CAFOs inspections into ICIS, and I learned that it will involve a significant amount of work on our part . Given the ICIS resource constraints on our part, I suggest that we go with your language below . I believe we can meet the WP objectives via non-ICIS approach.

Can I tell IEPA contact person that we have agreed upon the following language ?

Indicia of Progress: Illinois EPA creates and maintains ~~in ICIS~~ a consolidated inventory of Large CAFOs and other permitted CAFOs. The inventory is easily accessible to all Illinois EPA staff and the public. Illinois EPA conducts NPDES evaluations at 25 potential Large CAFOs by June 1, 2013, consistent with approved SOPs. [Illinois EPA will report all CAFO inspections it conducted to U.S. EPA annually by July 31](#). Illinois EPA implements approved annual inspection plans for permitted CAFOs consistent with the National Compliance Monitoring Strategy. Illinois EPA implements a satisfactory training program for inspectors. Illinois EPA responds to all citizen complaints and emergency CAFO-related discharges in a timely manner. Illinois EPA identifies and records 100 percent of Single Event Violations and all wet weather SNC in ICIS.

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From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]
Sent: Tuesday, November 27, 2012 8:41 AM
To: Sofat, Sanjay
Cc: Maraldo.Dean@epamail.epa.gov
Subject: Draft Language for CAFO Workplan - Sanjay, let me know if this looks okay

Sanjay,
we talked yesterday about removing the citation to ICIS in the CAFO workplan. Utilizing ICIS was initially envisioned to accomplish several things: a management information system to maintain the inventory, reporting and tracking inspections, and making the information available to EPA and the public. Citing resources and priorities, you've indicated that you intend to meet these objectives with your own approach and have requested that the ICIS requirement be dropped from the Workplan. While we highly encourage the use of ICIS and wish to continue discussions with you about how it can be utilized, if you can confirm that the objectives listed above can be met, we will agree to remove it from the Workplan. Per our last discussion, I also understand that you are looking into whether reporting of these inspections can be done through ICIS.

I reviewed the workplan to see if it reflects the 3 items above and added in language for reporting of inspections(done manually or through ICIS, depending what you find out). See redraft below:

Indicia of Progress: Illinois EPA creates and maintains ~~in ICIS~~ a consolidated inventory of Large CAFOs and other permitted CAFOs. The inventory is easily accessible to all Illinois EPA staff and the public. Illinois EPA conducts NPDES evaluations at 25 potential Large CAFOs by June 1, 2013, consistent with approved SOPs. [Illinois EPA will report all inspections it conducted to U.S. EPA annually by July 31](#). Illinois EPA implements approved annual inspection plans for permitted CAFOs consistent with the National Compliance Monitoring Strategy.

Illinois EPA implements a satisfactory training program for inspectors. Illinois EPA responds to all citizen complaints and emergency CAFO-related discharges in a timely manner. Illinois EPA identifies and records 100 percent of Single Event Violations and all wet weather SNC in ICIS.

Please reply back to let me know if this looks okay. Thanks

-Ryan
(312)353-4366

▼ "Sofat, Sanjay" ---11/26/2012 08:42:47 AM---Ryan- can you give me a call at 217-785-2435? I have a quick question re CAFO work plan. Thanks , S

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Cc: "Willhite, Marcia" <Marcia.Willhite@Illinois.gov>, Dean Maraldo/R5/USEPA/US@EPA
Date: 11/26/2012 08:42 AM
Subject: RE: Draft CAFO Workplan.

Ryan- can you give me a call at 217-785-2435? I have a quick question re CAFO work plan. Thanks ,

Sanjay K. Sofat
Division Manager
Division of Water Pollution Control
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Phone: 217-558-2012
Fax: 217-782-5549
e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]
Sent: Monday, November 19, 2012 11:10 PM
To: Sofat, Sanjay
Cc: Willhite, Marcia; Maraldo.Dean@epamail.epa.gov
Subject: RE: Draft CAFO Workplan.

I think that we are in agreement of what can be done and I'm not asking for more than what we discussed. (in my mind nothing has changed from what we discussed - its a matter of how to word/ reflect it clearly)

If you read the language, it simply says what was agreed to a year ago, "provide an inventory" . . . "as a basis for the workload assessment". We recognize that it will not be perfect and will continue to be updated. The paragraph goes on to explain the "how" . . . by including all confirmed Large and permitted CAFO sites. This seems perfectly consistent with what we discussed. Per our conversation, the word

"final" was taken out from the previous version. I want to avoid "confirmed Large CAFOs" be misinterpreted as relaxing what we previously agreed to or only being a limited inventory.

▼ "Sofat, Sanjay" ---11/19/2012 05:24:09 PM---If we take out the word "confirmed" out of the language, then we go back to the original issue- how

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Cc: "Willhite, Marcia" <Marcia.Willhite@Illinois.gov>
Date: 11/19/2012 05:24 PM
Subject: RE: Draft CAFO Workplan.

If we take out the word "confirmed" out of the language, then we go back to the original issue- how do you come up with the large CAFO inventory by February 28, 2013. You will still have several hundred unconfirmed AFOs/CAFOs in the database. It is impossible to achieve this task, unless you have a different definition of the large CAFO inventory.

I am going to let Marcia know about this.

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From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]
Sent: Monday, November 19, 2012 5:15 PM
To: Sofat, Sanjay
Subject: RE: Draft CAFO Workplan.

Sanjay,
I made one change in the first sentence and am submitting this to the workplan folks. Thank you for the discussions on this. I am actively working on the inventory. I got a draft final last week that needed some work and is back on my desk.

I think that its OK to explain/reflect your approach to establish the inventory is to confirm facilities but I think that its also important to maintain the integrity that it is THE inventory with no qualifiers.

b. By February 28, 2013, Illinois EPA will provide an inventory to U.S. EPA that lists Large CAFOs and any other permitted CAFOs as a basis for the final Workload Assessment. Illinois EPA will maintain and regularly update its CAFO inventory through a process of confirming sizes of additional livestock facilities. Illinois EPA will make the inventory publically accessible and send updates to EPA at least twice a year. By September 30, 2013, Illinois EPA will provide an update to its CAFO inventory that confirms whether additional livestock facilities are Large CAFOs. Illinois EPA will have a process in place to get regular updates about potential Large CAFOs from Illinois Department of Agriculture and Illinois Department of Public Health. The inventory will include all confirmed Large and permitted CAFO sites identified by Illinois EPA regional offices, permit applications, citizen tips and complaints, U.S. EPA, the Illinois Department of Agriculture, the Illinois Department of Public Health, and the Illinois Emergency Management Agency. The inventory may make use of a Geographic Information System-based pilot inventory currently being developed for seven high profile counties.

▼ "Sofat, Sanjay" ---11/19/2012 01:46:25 PM---Ryan- Here are some changes to the language. I thought about your suggestion re 2nd sentence, but d

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Date: 11/19/2012 01:46 PM
Subject: RE: Draft CAFO Workplan.

Ryan-

Here are some changes to the language. I thought about your suggestion re 2nd sentence, but didn't expand on it. The reason is- most like IEPA will use more than one way to confirm large CAFOs, and coming up with that list of ways IEPA will confirm large CAFOs would be hard to do at this time.

b. By February 28, 2013, Illinois EPA will provide an inventory to U.S. EPA that lists all confirmed Large CAFOs and any other permitted CAFOs as a basis for the final Workload Assessment. Illinois EPA will maintain and regularly update its CAFO inventory through a process of confirming sizes of additional livestock facilities. Illinois EPA will make the inventory publically accessible and send updates to EPA at least twice a year. ~~in September and February.~~ By September 30, 2013, Illinois EPA will provide an update to its CAFO inventory that confirms whether additional livestock facilities ~~AFOs~~ are Large CAFOs. Illinois EPA will

have a process in place to get regular updates about potential Large CAFOs from Illinois Department of Agriculture and Illinois Department of Public Health. The inventory will include all confirmed Large and permitted CAFO sites identified by Illinois EPA regional offices, permit applications, citizen tips and complaints, U.S. EPA, the Illinois Department of Agriculture, the Illinois Department of Public Health, and the Illinois Emergency Management Agency. The inventory may make use of a Geographic Information System-based pilot inventory currently being developed for seven high profile counties.

Please let me know if you are okay with the changes. Thanks for all your help.

Sanjay K. Sofat
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Division of Water Pollution Control
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Fax: 217-782-5549

e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Monday, November 19, 2012 10:59 AM

To: Sofat, Sanjay

Subject: RE: Draft CAFO Workplan.

Sanjay,

I have to run to a meeting. Here is the language. It would be good to have the 2nd sentence be more concise if possible. . . gotta run . . .

b. By February 28, 2013, Illinois EPA will provide an inventory to U.S. EPA that lists all large CAFOs and any other permitted CAFOs as a basis for the final Workload Assessment. Illinois EPA will maintain and regularly update its CAFO inventory through a process of confirming sizes of additional facilities. Illinois EPA will make the inventory publically accessible and send updates to EPA at least twice a year in September and February. By September 30, 2013, Illinois EPA will provide an update to its CAFO inventory that confirms whether additional AFOs are Large. Illinois EPA will get regular updates about potential Large CAFOs from Illinois Department of Agriculture and Illinois Department of Public Health. The inventory will include all large and permitted CAFO sites identified by Illinois EPA regional offices, permit applications, citizen tips and complaints, U.S. EPA, the Illinois Department of Agriculture, the Illinois Department of Public Health, and the Illinois Emergency Management Agency. The inventory may make use of a Geographic Information System-based pilot inventory currently being developed for seven high profile counties.

▼ "Sofat, Sanjay" ---11/19/2012 09:25:00 AM---Thanks. Sanjay K. Sofat

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Date: 11/19/2012 09:25 AM

Subject: RE: Draft CAFO Workplan.

Thanks.

Sanjay K. Sofat
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Division of Water Pollution Control
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e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]
Sent: Monday, November 19, 2012 9:24 AM
To: Sofat, Sanjay
Subject: RE: Draft CAFO Workplan.

Okay. I may be a few minutes late. I'll call you shortly after 10.

▼ "Sofat, Sanjay" ---11/19/2012 08:57:14 AM---Can we do a 10 o'clock call? Sanjay K. Sofat

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Date: 11/19/2012 08:57 AM
Subject: RE: Draft CAFO Workplan.

Can we do a 10 o'clock call?

Sanjay K. Sofat
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e-mail: sanjay.sofat@illinois.gov

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Monday, November 19, 2012 8:55 AM

To: Sofat, Sanjay

Subject: RE: Draft CAFO Workplan.

I just tried you. You may be on the way to your 9:00. I am open today between noon and 2:00. If that does not work, I can make 10:00 work. What's your preferred time?

▼ "Sofat, Sanjay" ---11/19/2012 08:45:59 AM---Ryan- I just left you a message. I am here all day, please let me know when you would have time to

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>

To: Ryan Bahr/R5/USEPA/US@EPA,

Date: 11/19/2012 08:45 AM

Subject: RE: Draft CAFO Workplan.

Ryan- I just left you a message. I am here all day, please let me know when you would have time to discuss the CAFO WP. Thanks,

Sanjay K. Sofat
Division Manager
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From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]
Sent: Friday, November 16, 2012 10:03 AM
To: Sofat, Sanjay
Subject: RE: Draft CAFO Workplan.

I am off today and to do some things with the kids. Monday? I'm open except for 9:00 and 11:00

▼ "Sofat, Sanjay" ---11/16/2012 09:45:32 AM---Ryan- Do you have time today to talk about CAFO work plan? Sanjay K. Sofat

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Date: 11/16/2012 09:45 AM
Subject: RE: Draft CAFO Workplan

Ryan- Do you have time today to talk about CAFO work plan ?

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From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Thursday, November 15, 2012 7:47 AM
To: Sofat, Sanjay
Subject: Re: Draft CAFO Workplan

I've been tied up with the meeting(s). It has been good to have Chuck here to voice Regional Office perspective for OECA and to meet him.

▼ Ryan Bahr---11/13/2012 06:18:25 PM---I'll try you tomorrow. I am just about to jump on a train and will not have a cell phone. From: "So

From: Ryan Bahr/R5/USEPA/US
To: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>,
Date: 11/13/2012 06:18 PM
Subject: Re: Draft CAFO Workplan

I'll try you tomorrow. I am just about to jump on a train and will not have a cell phone.

▼ "Sofat, Sanjay" ---11/13/2012 03:36:40 PM---Ryan- please call me at 217 720 1226 if you have time to discuss work plan. From: Bahr.Ryan@epamail.

From: "Sofat, Sanjay" <Sanjay.Sofat@Illinois.gov>
To: Ryan Bahr/R5/USEPA/US@EPA,
Date: 11/13/2012 03:36 PM
Subject: Re: Draft CAFO Workplan

Ryan- please call me at 217 720 1226 if you have time to discuss work plan.

From: Bahr.Ryan@epamail.epa.gov [<mailto:Bahr.Ryan@epamail.epa.gov>]

Sent: Wednesday, November 07, 2012 04:36 PM

To: Sofat, Sanjay

Subject: Draft CAFO Workplan

Draft Workplan

(See attached file: Updated_workplan_WECAB-s_section.docx)